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June 16, 2017

VIA ECF

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 6052
Trenton, NJ 08608

**Re: *Cole, at al. v. Nibco, Inc.*,
Civil Action No. 13-7871 (FLW) (TJB)**

Dear Judge Bongiovanni:

We represent the Plaintiffs in the above-referenced matter. We submit this letter jointly with Lathrop & Gage, LLP, counsel for Defendant, Nibco, Inc.

On May 11, 2017, Your Honor entered a scheduling order setting several deadlines, including the briefing deadlines for Plaintiffs' class certification motion and Nibco's summary judgment motion. In light of the number of issues raised in both Plaintiffs' motion for class certification and Nibco's motion for summary judgment, the parties respectfully request a short extension on the briefing deadlines for those motions. The scheduling order also did not set any deadlines for *Daubert* motions for either party.

The attached amended Discovery Plan sets forth a schedule for all remaining dates referenced in the Court's May 11, 2017 scheduling order and proposes dates for the parties' anticipated *Daubert* motions. Accordingly, Plaintiffs and Defendant respectfully request that the Court enter the attached Discovery Plan in the form of the Proposed Order attached thereto as Exhibit A.

Respectfully,

/s/ *Bruce D. Greenberg*

Bruce D. Greenberg

BDG:emp
Enclosure
cc: All Counsel of Record (via ECF)